

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL ACTION  
NO. 09-CR-20192

Plaintiff,

HON. JULIAN ABELE COOK

D-1 GHAZI MANNI, et al.,

Defendants.  
\_\_\_\_\_/

**STIPULATION FOR CONTINUANCE OF TRIAL DATE  
AND FINDING OF EXCLUDABLE DELAY**

In accordance with decisions made by the Court and the parties at the status conference held on February 11, 2013, the parties through their respective counsel stipulate and agree that a pretrial conference will be held at 1:00 p.m. on June 18, 2013, and that trial will commence at 8:30 a.m. on July 2, 2013.

Pursuant to 18 U.S.C. § 3161(h)(7)(A), the parties stipulate that the extended time period from February 11, 2013 until the trial begins on July 2, 2013, shall constitute excludable delay and that the ends of justice served by this delay outweigh the best interests of the defendants and the public in a speedy trial. The parties agree that the delay until trial is necessary for the following reasons: (1) as

a result of factors previously explained to the Court in chambers, trial preparation has been hampered on both sides; (2) a trial conflict has arisen involving an attorney for one of the defendants; (3) the discovery in the case is voluminous and the defendants require additional time to complete their review of the discovery materials in order to: (a) consider, prepare, and file pretrial motions; (b) evaluate their need for expert defense witnesses; (c) consider and conduct plea negotiations, and; (d) to adequately prepare for a lengthy trial.

**IT IS SO STIPULATED.**

BARBARA L. McQUADE  
United States Attorney

s/David E. Morris  
DAVID E. MORRIS (P61451)  
Assistant U.S. Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
[Dave.Morris@usdoj.gov](mailto:Dave.Morris@usdoj.gov)  
Telephone: (313) 226-9646

s/Neil H. Fink with consent  
NEIL H. FINK (P13430)  
Attorney for Ghazi Manni  
185 Oakland Avenue, Suite 250  
Birmingham, MI 48009  
Telephone: (248) 258-3181  
[Dadcoach23@aol.com](mailto:Dadcoach23@aol.com)

s/Saima Mohsin  
SAIMA MOHSIN (P73990)  
Assistant U.S. Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
[Saima.Mohsin@usdoj.gov](mailto:Saima.Mohsin@usdoj.gov)  
Telephone: (313) 226-9163

s/Ray E. Richards II with consent  
RAY E. RICHARDS II (P56972)  
Attorney for Keith Triplett  
29488 Woodward Avenue, Suite 444  
Royal Oak, MI 48073  
Telephone: (248) 962-0700  
[Rayrichardsesq@gmail.com](mailto:Rayrichardsesq@gmail.com)

s/Martin E. Crandall with consent  
MARTIN E. CRANDALL (P26824)  
Attorney for Anton Currie  
Clark Hill PC  
500 Woodward Avenue, Suite 3500  
Detroit, MI 48226  
Telephone: (313) 965-8413  
[mcrandall@clarkhill.com](mailto:mcrandall@clarkhill.com)

s/Stevin J. Groth with consent  
STEVIN J. GROTH  
Attorney for Kashif Payne  
416 N. Erie Street, Suite 100  
Toledo, OH 43604  
Telephone: (419) 930-3030  
[stevingroth@hotmail.com](mailto:stevingroth@hotmail.com)

Dated: February 15, 2013.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL ACTION  
NO. 09-CR-20192

Plaintiff,

HON. JULIAN ABELE COOK

D-1 GHAZI MANNI, et al.,

Defendants.  
\_\_\_\_\_/

**ORDER FOR CONTINUANCE OF TRIAL DATE  
AND FINDING OF EXCLUDABLE DELAY**

Upon this Court's consideration of the parties' stipulation for a continuance and the Court being apprised of the circumstances, IT IS ORDERED that a pretrial conference will be held at 1:00 p.m. on June 18, 2013, and that trial will commence at 8:30 a.m. on July 2, 2013.

**IT IS FURTHER ORDERED** that the time period between the pretrial conference held on February 11, 2013, and the trial to be held on July 2, 2013, shall be deemed excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161, because considering the factors listed in section 3161(h)(7)(B) and the reasons given by the parties this Court finds that the ends of justice served by this delay outweigh the best interests of the defendants and the public in a speedy

trial.

**IT IS SO ORDERED.**

Date: March 1, 2013

s/Julian Abele Cook, Jr.

JULIAN ABELE COOK, JR.  
United States District Judge